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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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EDWARD PICKMAN,

07 CV 7306 (SHS)(THK)

Plaintiff,

**PLAINTIFF'S PROPOSED
VOIR DIRE QUESTIONS**

-against-

MILLER'S LAUNCH, INC.,

Defendant.

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Plaintiff respectfully requests the Court inquire as to the following subjects on *voir dire*:

1. Whether anyone has any opinions concerning the amount of money damages that can or should be awarded in a lawsuit, as compensation for personal injuries? If so, please explain opinions.
2. Whether anyone has any opinion concerning the awarding of money damages for pain and suffering caused by another's negligence? If so, please explain opinion.

3. Whether anyone is of the opinion that an injured party should not be awarded substantial sums for pain and suffering? If so, please explain opinion.

4. Whether anyone believes that a person injured by reason of the negligence of another party should not be compensated for his or her injuries? If so, please explain opinion.

5. Whether anyone has opinion regarding the alleged litigation crisis and the need for tort reform? If so, please explain opinion.

6. Whether anyone has negative feelings about trial lawyers, that is lawyers who represent injured people on a contingency basis? If so, please explain opinion.

7. Whether anyone is of the opinion that jury's awards in the past have been too high? If so, please explain.

8. If it were up to you, would anyone change our civil justice system to limit or cap the amount of money an individual could be awarded?

9. Does anyone feel that lawsuits generally have a negative impact on you, your company or someone close to you?

10. What living person do you most admire?

11. Have you, your spouse, or any family member ever been employed in any capacity in the maritime industry? If so, in what capacity?

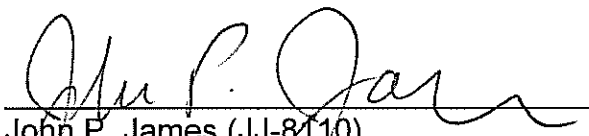
12. Have you, your spouse, or any family member ever sustained any injury or had any accident which might affect your feelings for, or against, either party, or your views of this case? If so, please specify which part of your body you injured.

13. Have you, your spouse, or any family member ever had an accident or injury where a claim for money was made? If so, please specify which part of the body was injured.

Dated: New York, New York
September 2, 2008

FRIEDMAN, JAMES & BUCHSBAUM LLP
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By:


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